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RESPONSES TO IG REPORT RE: PMCD

12 April 1976

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This report is an obvious reflection of preconceived bias developed by the inspection team prior to commencement of the survey. Evidence to the contrary, or the opportunity to understand a complex technical field in personnel management notwithstanding, ^{is all ignored, and} the team gives all appearances of having ~~be~~ set out to prove points of their own and component attitudes collected and collated prior to approaching OP and PMCD for information.

The IG team appears to have walked into a trap in their analysis of PMCD. Report makes allegations of incompetence based on inexperience, ignorance and relatively junior grade levels on the part of the PMO's. By the terminology used, conclusions drawn, recommendations and observations made in their report it is obvious that, like so many (all?) high level officials in this Agency the IG inspectors have neither the training in, nor appreciation for personnel/position management as a function of overall managerial responsibility.

Office of the IG in this report sets a framework from which PMCD organizational analysis and specific delegated authority for grade allocation should be strengthened, not removed. Managers in this Agency are not held accountable for expenditure of public funds for personnel salaries through any review process by the Comptroller, OF, Audit Staff nor, PMCD. In no instance is there ~~is~~ a requirement to demonstrate the expenditure of public funds is in any way related or needs to be related to a return on investment. So long as the manager can "Snow" (IG term) the Deputy Directors, Comptroller, DCI, OMB and PMCD review processes, funds are made available for the number of personnel/positions requested, with minimal constraints. PMCD's review of structure and positions serves to advise management (if the information were used) at all levels that there are at least questionable if not outright

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irregular expenditure of public funds for positions which have not value, or at best have values much less than their cost. Those factors are soft pedalled even by PMCD since top management appears to be disinterested and unconcerned.

IG para 2 - The report ~~states~~ states that in order to retain balance of average grade and other position controls, PMCD will often (always?) recommend downgrade of positions in order to upgrade others, with no concern for job/pay equity related to the downgraded position(s). This is in fact not the case. What PMCD is usually saying is that the balance of functional values between positions is such that functions and positions provide for the balancing, while maintaining job/pay equity. There is normally enough inflation in other positions in a component to provide for this offset without affect on properly graded positions.

The significance of the phrase which states that PMCD is influenced by existing ~~positions~~ positions during supergrade review is not clear. What are the influences and what effect do they have.

IG para 3 d. - Lack of effectiveness with GS-14 and higher graded positions is normally due to ~~lack~~ lack of management, not lack of PMCD understanding or ability. Since the manager is not accountable for the value of his positions nor the product of his personnel, he can resort to emotions and personal relationships to sustain the grade of a position, regardless of the plausibility of any evaluation. There being no authority in PMCD, nor competent review process in or out of the Agency, the manager can usually maintain such positions so long as they do not exceed his maximum authorization.

The IG team skimmed over a very significant relationship in para 3d. There is a comment about mismatches between personal and position grades. Rather than being a reflection of PMCD inaction, this frequently is a reflection of lack of personnel/position management, and again reinforces the contention that there is not personnel management program in effect in the Agency. ~~Approved For Release 2001/09/04 : CIA-RDP83-01004R000100060001-7~~
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the Agency policy, there is no need to relate the grade of person

with the grade of the ~~rank~~ position. In any other Agency of the U.S. Government, this would be illegal, here it is not even considered unethical.

IG report para 5 - Ceiling, authorized average grade, and structure authorization are maximum levels within which the manager ~~is~~ restricted - equity, position and personal values are separate determinations to ~~made~~ be made within those constraints and which require evaluation and determinations by analysts properly qualified to draw the necessary distinctions. The maximum level is not a target, but a constraint. Good position management and economy minded management may hold positions below the authorized levels within a proper context of good management.

IG report para 6 - Totally erroneous, PMO's performing surveys or other evaluations must become thoroughly familiar with the organization, the positions and interrelationships with other positions and organizational functions in order to complete the PM analysis. This ~~evidence~~ ^{function} is performed and is evidenced in the survey report and by additional information of record in PMCD in terms of the comparability data/position base used by the PMO to establish the comparability level of the positions under review, each of which must be substantiated in the PMCD review and analysis process prior to being released to the component for analysis and comment. There is a mistaken belief in this Agency, based on ignorance of relative job values, that positions under review must be matched with other positions with identical functions in order to provide the basis for evaluation. In fact there are several factors which can be properly applied to positions across the board to establish the comparability basis. These include ^{relative} level of the position in the organization, degrees of supervision and review exercised over the incumbent, delegated authorities (or the lack of authority), relationships to and impact on other positions functions, and significance and impact of products of the position. There are others which the PMO must consider in order to understand the specific jobs and to provide a basis for the determinations arising from the PMCD evaluations.

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IG para 7 - Like so many, the IG ascribes a significant degree of uniqueness to Agency positions, wrapped in a mystique which is self defined and totally unrelated to position functions and Agency missions in the rest of the Government. In actual fact, with some minor adjustments in criteria to fit truly unique requirements in the Agency we could probalby allocate some 75-80% of Agency positions according to Civil Service position standard criteria. In most instances Agency positions, and presumably personnel could be transferred into the competitive service with minimal loss of effectiveness or ability to produce, as could many personnel from the competitive service enter this agency with minimal time to adjust to our methods, assuming a compabable degree of qualifications in the appropriate field of endeavor.

The paragraph refers to components being in a constant state of flux. In actual fact the majority of components in the Agenncy are relatively static in terms of organization structure and the requirements of positions in terms of grades and skills. Few organizations have mission orientation which requires frequent modification of position structures and grades. Our ~~xxxxxx~~ experience indicates that many reorganzizations take place to cover personnel (specific personnel) with job security and/or to obfuscate PMCD determinations.

IG para 8 - By inference this paragraph constitutes incrimination of agency managers by suggesting that there is, and needs to be no concern for value received in relation to salaries paid employees. It is amazing hhat such statements could be forwarded outside this Agency such as this one has.

IG para 9 = See comments related to para 7.

Do we ever have work that is comparable to or less complex than that performed in other agencies? What the IG inspectors appear to have completely failed to recognize is that external comparisons are used by PMCD to maintain.

current~~x~~ grades, to recommend the downgrading of positions and to support upgrading of positions by analysis of comparable functions (including relative complexity) and pay levels. Why do the comparability statements have to be couched only in terms of negative actions?

IG comments to the effect that PMCD divorces the analysis of a position from the position functions and instead relies on an evaluation of the incumbent in order to establish a grade level. While the primary emphasis of position evaluation is to allocate the functions to be performed in the position, the incumbent most certainly can (and legitimately does) impact on the value of the position at a point in time, and the analyst validly considers the work being performed, not what should be performed under more ideal conditions, when recommending a downgrade on the basis of current levels of performance. The requirement for a position and even the requirement that ~~a~~ position functions be performed at a specified level, are not necessarily related to the incumbent if it is obvious the job cannot be performed as designed, and the incumbent is not to be removed from the position.

Why did the inspectors not also point out all the cases where incumbent performance causes the position grade to increase, perhaps with little hope that the incumbent will benefit because of the more valuable work?

IG para 10 - The confusion is not apparent in PMCD. There are at least dual functions, job/pay equity and monitoring of the various control levels ~~are~~ only two of the functions of the Division. There is confusion about the source of authorities in these and other areas, but not in the analytical ~~role~~ roles to be played in the Division. Does the IG suggest that job/pay equity should be ignored if application of that principle could cause a component average grade to be reduced. Again, as someplace above, we do not see that the setting of parameters on ceiling, average grade, etc. are limits which necessarily have to be filled to the maximum authorized levels.

IG para 14 - Is there an inference that the Van Damm report was "valuable", but invalid. Perhaps the IG staff should have put approximately the same effort into learning about ~~there~~ their subject matter as was put forth by Mr. VD.

IG para 16 - This para addresses the reasons for some PMCD analysts to have respectful relations with the components they service. The primary thrust is that the inspectors "...suspected ... these analysts... are unusually lenient..." in their dealings with the components. *Although denied the suggested lack of integrity, this is a very serious* This is a very serious allegation to be dropped with no more than the simple accusation, no substance or supporting data whatsoever.

IG para 19 - Again a reflection ~~by the team~~ of the inspection team's failure to do their homework while making broad statements which are later used to support policy recommendations. ERDA does use a classification by management committee system, using classifiers to write and coordinate standards and to monitor overall equity of grade allocations. "What is omitted is that the ERDA is required to conform in general substance with CSC criteria, and evidence of abuse of the excepted authorities could result in ERDA losing their classification authority.

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IG report, in this para suggests that position classification is a functions which is understood by Agency managers. This is fallacy since at no time in career development and training are our managers exposed to the concepts and requirements for classification programs. Based on the level of ignorance in this Agency and others, it is totally erroneous to state that managers have any understanding or appreciation for the classification processes.

IG para 21 - I fear the inspectors went away with a misconception about the FES system. Yes it ~~should~~ be easier to explain but it is not a change in system, philosophy or applications - ~~it~~ it will not rid us of the adversary situations.

Agency classification system, but only if it is backed up at the DCI level with properly qualified review staff with authority to make specific determinations and implement them over the objections of a Deputy Director.

IG para 22 - Will pick on it here. Monitor(ed) is an overused term in the report which generates visions of children monitoring the daily TV cartoons - aware of what is developing and capable of comment, but powerless to change the outcome. For a report which purports to support more specific definition of responsibilities and authorities, the recommendations are certainly couched in terms which would not serve to relieve present *ambiguous* conditions, or ~~ambiguities~~.

IG para 23 = Managers are not unduly restricted by PMCD recommendations and are not accountable to anyone. There is no significant trauma in PMCD by being overridden by D/Pers or the DDA. We don't claim perfection only a depth of analysis and *unbiased* points of view, which are not necessarily reflected in those override decisions.

IG para 24 - the placement of the PMCD function is not important, I agree but, the exercise of the functions is most definitely important to the legal and equitable well being of the Agency.

IG para 25 - Review and reversal of PMCD determination can be entirely proper in the current environment or one that is new. Separate politics from functional value and PMCD has as strong a grasp of understanding on upper level positions as on the lower levels. We are not lacking in ability but in defined standards and policy guidance and support, understanding has been previously addressed.

IG para 26 - No effective and impartial ~~xx~~ review route - true. More reinforcement for a review authority above the Deputy Directors would appear appropriate.

IF para 29 - Agree, better trained officers, longer tours and implementation of FES could assist in the removal of fundamental problems of PMCD/component relationships. Probably would not increase acceptance.

~~XX~~ IG para 30 - Agree that delegating so much authority to the DDs' is "setting the fox to guard the chickens". PMCD influence would disappear in the components on the basis that the DD is more likely to support his component chiefs regardless of the validity of PMCD analysis. In this and other observations the report moves further and further away from any need for the managers at the DD and Office level to learn about and practice sound position and personnel management.

IG para 31 - This para further recommends a shift in authority to the Directorates and represents the general tone and validity of the report as a whole. The recommendation is made with no understanding of the processes or the system, nor with any degree of substantiation for the recommendation. This would represent a MAJOR shift in policy and should be supported by substance of analysis.

IG para 37 - Like so many levels in the Agency there is a false premise mentioned here, i.e., analyst grade represents intellect and expertise in the field. Training, experience and knowledge of the processes involved are not even considered. IG ^{implies} states that GS-12 and GS-13 level analysts do not have capability to properly perform assigned functions. This para and other material in this report could be used through channels to justify journeyman level grades of at least GS-14, if not GS-15 for PMCD analysts. To do so would be as fallacious as the general trend of this report, but would lend unfounded credence to PMCD analysis and reports.

IG 38b - IG suggests that PMCD actions could open the eyes of CSC and OMB and lead to imposed cuts, possible criticism and misunderstanding of the Agency needs for positions. If we are that vulnerable it is difficult to see how the proposed transfers of authority will change the picture. ~~XXXXXX~~

IG para 39 - This para contradicts a concept proposed in a previous para in which it was suggested that PMCD cannot possibly work in an organization sufficiently to learn enough to properly analyse the organization and its positions, except over a very long period of time. This para suggests that current surveys are carried to too great a depth and should be reduced. Lack of full organization review can lead only to less understanding and leave PMCD open to even greater charges of ignorance.

IG Conclusion G-1 - There would be little, if any purpose in the conduct of surveys if the review authority is in the same chain of command as the positions being reviewed.

Conclusion G-2 - Less authority proposed than at present, job/pay equity cannot be resolved by an Office Head, appeal beyond the DD will normally go to the DCI, who will feel compelled to support his senior officers regardless of validity of arguments. This assumes, as does the IG that ~~that~~ PMCD remains buried in OP and has no charter as an Agency authoritative source. Who would define significant conflicts?

Conclusion G-3 - With delegation of so much control to the DD's:
The standards would be worthless.

Position evaluations would have no validity and would probably result in more adversity.

Let
Ensure component heads request only what has already been approved by the appeal authority, the DD.

Conclusion G-4 - Would require PMCD staff of approximately one or two GS-05 clerks. There would be no professional work involved and the Agency would be negligent to pay salaries in excess of the value of the work performed.

Conclusion G-5 - With delegation to the DD's to resolve appeals, surveys will not be necessary, standards would be worthless - let them develop their own.

Conclusion G-6 - ~~Ex~~ Accelerate the development of standards. WHY?

Conclusion G-7 - ~~Several~~ clerks could perform the most meaningful functions remaining for PMCD if IG recommendations are implemented. There would be absolutely no need to maintain a professional staff. Like the SOD situation, perhaps the proper approach would be to insure that ~~the~~ OP has a ~~new~~ corps of classifiers available to pick up the pieces when the proposed system falls apart, but in the meantime find jobs for them ~~which~~ which will have some relationship to their grade levels.

Recommendation R-7 -If a DD goes forward with a request for additional positions and/or upgrades based on job/pay equity, what will constitute a proper statement ~~XXXXX~~ that PMCD recommendations have been considered? A mere statement to that effect?

Recommendation R-8 - A clerical function which could be assigned to the number 3 secretary in the office of the D/Pers.

Recommendation R-9 - Already addressed. "Revise PMCD procedures, position surveys, scheduling and manpower as indicated in conclusions ~~XX~~ G-3 through G-7". Implemenation of the recommendations in this report consititutes technical abolishment of PMCD, there would be specific and totally unjustified waste of manpower and money by increasing the staff, particular at the professional levels.